

WALLACE P. HELLER
COMMUNICATIONS ADMINISTRATOR



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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**COUNTY OF LAKE RADIO DEPARTMENT**

1303 NORTH MILWAUKEE AVENUE

LIBERTYVILLE, ILLINOIS 60048

March 18, 1993

RECEIVED

MAR 22 1993

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street N.W. - Room 222
Washington DC 20554

FCC - MAIL ROOM

RE: PR Docket 92-235

Dear Ms. Searcy:

The proposed rule changes requiring existing users of UHF and VHF channels to reduce transmitter frequency deviation and power levels by January 1996 would be financially devastating to countywide system users such as Lake County. We would be forced to acquire land, erect towers, and purchase additional base stations to split up our system geographically in order to comply with the reduction in transmitter power and deviation.

The proposed rule changes may be necessary but the three year time frame is unreasonable. While it may be technically possible to reduce transmitter frequency and deviation, I don't think the technology is available to effectively reduce receiver channel spacing. Even if such technology becomes available, we would have to replace all of our existing equipment. We have hundreds of mobiles and portables. The replacement cost of all of our equipment in three years would be prohibitive.

I have not heard of any vendor announcement that narrow band equipment is available, except possibly ACSB, that could selectively receive voice radio signals with the proposed reduced channel spacing. Before the proposed Part 88 rules are put into effect, selective narrow band equipment has to be available on a competitive basis and the time